

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

ROBERT MORGAN #596132,

Plaintiff,

NO. 1:17-cv-206

v

HON. GORDON J. QUIST

GEORGE JOHNSON, SUE  
BUSKIRK, SUBRINA AIKEN,  
KEITH PAPENDICK, ANDREA  
LINDHOUT, LYLE MINDLIN,  
RICHARD HARBAUGH, and  
RICHARD RUSSELL,

MAG. RAY KENT

Defendants.

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Exhibit B

**Executed** Affidavit of Richard Harbaugh, R.N.

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RICHARD HARBAUGH, and  
RICHARD RUSSELL,

MAG. RAY KENT

Defendants.

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**AFFIDAVIT OF RICHARD HARBAUGH, R.N.**

I, Richard Harbaugh being duly sworn, depose and say as follows:

1. I am a Registered Nurse and am currently employed by the Michigan Department of Corrections (MDOC) as the Clinical Assistant to the Chief Medical Officer (CMO) for the Bureau of Health Care Services (BHCS). I have been employed in this capacity since May 10, 2015. Prior to this appointment, I was employed as the Nursing Supervisor at Woodland Center Correctional Facility (WCC) at Whitmore Lake, Michigan.

2. If sworn as a witness, I can testify competently to the facts contained within this affidavit.


3. In my capacity as the Clinical Assistant to the CMO, I do not provide any direct patient care to prisoners. I do not have any supervisory responsibilities for administrative staff or individuals who do provide patient care.

4. As the Clinical Assistant to the CMO, one of my job responsibilities is to sign Health Care Step III grievance responses as the "Approver". Another BHCS staff member researches and develops the responses. I do not independently research each Step III grievance.

5. To the best of my knowledge, I do not have any direct information or knowledge regarding the Plaintiff's allegations; other than signing a Step III grievance response.

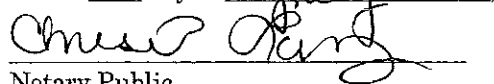
6. The documents referenced in this affidavit are records of regularly conducted activity of the Michigan Department of Corrections. The records were made at or near the time of the occurrences reflected, by a person with knowledge of those matters, or from information transmitted by a person with knowledge of those matters. These documents are kept in the regular course of business of the Michigan Department of Corrections. Any copy of these records attached to or accompanying this affidavit are true and accurate copies of the original records.

AFFIANT SAYS NOTHING FURTHER.

  
Richard Harbaugh, RN, Clinical  
Assistant to the Chief Medical Officer  
Bureau of Health Care Services

Subscribed and sworn to before me, a Notary Public,

on the 12 day of July, 2018

  
Notary Public  
Ingham County, Michigan

My commission expires: 6/27/24

**CHRISTEL JEAN LANZ**  
**NOTARY PUBLIC - STATE OF MICHIGAN**  
**COUNTY OF IONIA**  
**My Commission Expires June 27, 2024**  
**Acting in the County of Ingham**